

EXHIBIT 6

In the Matter Of:

Henry vs

Brown

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March 18, 2024



1 That required and College Board hired several
2 economists, several analysts to put this
3 information together.

4 In order for an educational
5 institution to be able to put a needs analysis
6 component together, it would take a significant
7 amount of not only staffing and expertise, but
8 also significant amount of systems.

9 And, again, one of the components
10 that College Board is responsible for is the
11 security of the data. And having educational
12 institutions be responsible for the security of
13 that data is also not advisable.

14 Q. You were also asked some questions
15 about the consensus methodology today?

16 A. Yes.

17 Q. And just so we have a clear record,
18 did Penn follow the consensus methodology?

19 MR. NORMAND: Objection to form.

20 Q. Let me just ask you, did Penn follow
21 the consensus methodology?

22 A. Okay.

23 I think at this point, I just really
24 need to say Penn used Penn's needs analysis.

25 Penn assessed students based on Penn's needs

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1 analysis.

2 We can see from all the material that

3 I've reviewed and I've shared and we've talked

4 about here today and the hours that I have spent

5 reviewing documents and having conversations

6 that Penn did Penn's thing. And consensus

7 methodology was totally different. And we can

8 see from just the data that we're looking at

9 what Penn did, how Penn did it, and how Penn

10 differed from consensus methodology.

11 And consensus methodology was a

12 handful of components of needs analysis. It

13 wasn't even the full needs analysis, as I've

14 talked to you about what institutional

15 methodology did.

16 So getting stuck on a sentence here

17 or a piece of data point there or an e-mail

18 there is at best frustrating because I know what

19 Penn's done; I've reviewed what Penn's done;

20 I've seen what Penn does.

21 Penn's goal is to support students.

22 Penn's continuous goal is to support students.

23 Penn now spends almost \$300 million of its own

24 money to try and help students in their Ivy

25 League education.

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1 I really think that we need to take
2 all of that information into consideration in
3 this conversation.

4 Q. Somehow this didn't come up today.

5 Who has been Penn's director of
6 financial aid since 2016?

7 MR. NORMAND: Objection to form.

8 A. I've been Penn's director of
9 financial aid since 2016.

10 Q. Earlier today, you testified in the
11 context of home equity policy, you said Bill
12 Schilling was, "trying to find a way to target
13 the less fortunate families."

14 What did you mean by that?

15 A. I meant that Bill was aware of in
16 looking at the analysis of our students and the
17 demographics of our students, that he was made
18 aware of between income cut-offs where our
19 population was the neediest based on what they
20 borrowed and based on what we were able to
21 provide them. So his focus was to try and
22 specify that group of -- that population in
23 trying to help them.

24 Q. Speaking of home equity, did Penn
25 follow the consensus methodologies approach to